

David Leit
Lawrence Bluestone
LOWENSTEIN SANDLER LLP
65 Livingston Avenue
Roseland, New Jersey 07068
973.597.2500

William A. Rakoczy (*pro hac vice*)
Deanne M. Mazzochi (*pro hac vice*)
Joseph T. Jaros (*pro hac vice*)
Yixin H. Tang (*pro hac vice*)
Neil B. McLaughlin (*pro hac vice*)
RAKOCZY MOLINO MAZZOCHI SIWIK LLP
6 West Hubbard Street, Suite 500
Chicago, Illinois 60654
312.527.4205

*Attorneys for Defendants Apotex Corp., Apotex Inc.
and Apotex Pharmachem Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

OTSUKA PHARMACEUTICAL CO., LTD.,

Plaintiff,

v.

APOTEX CORP., APOTEX INC.,
APOTEX PHARMACHEM INC., and
HETERO LABS LTD.,

Defendants.

Civ. A. No. 14-cv-8074-JBS-KMW

DOCUMENT ELECTRONICALLY FILED

NOTICE OF MOTION TO SEAL

Melissa Anne Chuderewicz
Christopher P. Soper
Brian Ronald Zurich
PEPPER HAMILTON, LLP
301 Carnegie Center
Suite 400
Princeton, New Jersey 08543

Attorneys for Plaintiffs Otsuka Pharmaceutical Co., Ltd.

PLEASE TAKE NOTICE that on April 20, 2015 at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant Apotex Pharmachem Inc., shall move before the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Room 1050, Camden, NJ 08101, for an Order pursuant to Local Rule 5.3(c) sealing certain materials filed under temporary seal.

PLEASE TAKE FURTHER NOTICE that in support of its application, Defendant will rely upon the accompanying Declaration of Yixin H. Tang, Esq. in Support of Defendant Apotex Pharmachem Inc.'s Motion to Seal Confidential Materials Pursuant to L. Civ. R. 5.3(c).

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 7.1(d)(4), no supportive brief is required for this motion.

A proposed form Order is also submitted herewith for the Court's consideration.

Dated: March 23, 2015

Respectfully submitted,

APOTEX PHARMACHEM INC.

By: s/ David Leit

David Leit
(dleit@lowenstein.com)
Lawrence Bluestone
(lbluestone@lowenstein.com)
LOWENSTEIN SANDLER LLP
65 Livingston Avenue
Roseland, NJ 07068
Telephone: (973) 597-2340
Facsimile: (973) 597-2341

Of Counsel

William A. Rakoczy (pro hac vice)
Deanne M. Mazzochi (pro hac vice)
Joseph T. Jaros (pro hac vice)
Yixin H. Tang (pro hac vice)
Neil B. McLaughlin (pro hac vice)
RAKOCZY MOLINO MAZZOCHI SIWIK LLP
6 West Hubbard Street, Suite 500
Chicago, IL 60654
Telephone: (312) 222-6301
Facsimile: (312) 222-6321

*Attorneys for Defendants Apotex Corp., Apotex Inc
and Apotex Pharmachem Inc.*